

1
2
3
4
5 UNITED STATES DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON
7 AT SEATTLE

8 SARA MURRAY,

9 Plaintiff,

10 v.

11 KING COUNTY COURT, et. al.,

12 Defendants.

CASE NO. 24-cv-00239

ORDER

13
14 This matter comes before the Court on the Notice of Attorney Withdrawal of
15 Rebecca Cambreleng. Dkt. No. 20. On February 5, 2024, United States Magistrate
16 Judge Jeff Armistead for the U.S. District Court for the District of Oregon granted
17 Sara Murray's motion for appointment of counsel solely to advise Murray on
18 jurisdictional issues. Dkt. No. 20-2 at 2-5. Cambreleng was appointed on February
19 7, 2024. Dkt. No. 20-2 at 2-6. On February 16, 2024, Judge Armistead granted
20 Murray's motion to transfer her lawsuit to this district. *See* Dkt. Nos. 16.

21 Cambreleng included a letter requesting the termination of her appointment
22 as pro bono counsel with her Notice. Dkt. No. 20-2 at 1. She requests withdrawal of
23 representation because she has completed her limited representation of Murray and

1 explains she is not licensed in Washington and does not intend to continue
2 representation of Murray. *Id.* at 6. Murray did not file a direct response to
3 Cambreleng's Notice or letter, but she acknowledges in a separate filing that
4 Cambreleng is "not representing or helping [her]" and "cannot." *See* Dkt. No. 25 at
5 12.

6 LCR 83.2(b)(1) states the circumstances and conditions for attorney
7 withdrawal. It states that "[l]eave [to withdraw] shall be obtained by filing a motion
8 . . . and proposed order for withdrawal," and "shall include a certification that the
9 motion was served on the client and opposing counsel." LCR 83.2(b)(1). Finally, a
10 "proposed order for withdrawal must (1) be signed by all opposing counsel or pro se
11 parties, and (2) be signed by the party's new counsel, if appropriate, or by the
12 party," and "[i]f a withdrawal will leave a party unrepresented, the motion to
13 withdraw must include the party's address and telephone number." *Id.*

14 Here, Cambreleng's Notice and letter do not satisfy the procedural
15 requirements of LCR 83.2(b) since her Notice and letter do not include Murray's
16 address or evidence of her consent. *See Dkt.* No. 20-2. And Cambreleng's withdrawal
17 will leave Murray unrepresented.

18 Despite these deficiencies, "[t]he trial court retains wide discretion in a civil
19 case to grant or deny a motion to withdraw." *Putz v. Golden*, No. C10-0741JLR,
20 2012 WL 13019202, at *3 (W.D. Wash. Aug. 3, 2012) (citing *Le Grand v. Stewart*,
21 133 F.3d 1253, 1269 (9th Cir. 1998); *Ohntrup v. Firearms Ctr., Inc.*, 802 F.2d 676,
22 679 (3rd Cir. 1986); *Bohnert v. Burke*, No. CV-08-2303-PHX-LOA, 2010 WL
23 5067695, at *1-*2 (D. Ariz. Dec. 7, 2010)). The consent of a client for an attorney to

1 withdraw is not dispositive, rather the district court may consider factors including:
2 “(1) the reasons why withdrawal is sought; (2) the prejudice withdrawal may cause
3 to other litigants; (3) the harm withdrawal might cause to the administration of
4 justice; and (4) the degree to which withdrawal will delay the resolution of the case.”
5 *Putz v. Golden*, 2012 WL 13019202, at *3.

6 Considering these factors, the Court finds it reasonable to grant
7 Cambreleng’s request. First, Cambreleng wishes to withdraw because she has
8 completed the limited purpose of her pro bono appointment—jurisdictional
9 analysis—and this lawsuit has been transferred from Oregon to this District where
10 Cambreleng is *not* authorized to practice law. Second, no defendants have appeared
11 in this lawsuit to be prejudiced. *See* Dkt. Third, Murray has applied for and been
12 granted in forma pauperis status to proceed pro se, so Cambreleng’s withdrawal will
13 not unreasonably hinder the administration of justice. Dkt. No. 26. And fourth,
14 given the limited purpose of Cambreleng’s pro bono representation, and the fact this
15 lawsuit has recently been transferred to this District, Cambreleng’s withdrawal will
16 not delay resolution of this case.

17 Accordingly, Cambreleng’s request to withdraw as counsel of record is
18 GRANTED.

19 It is so ORDERED.

20 Dated this 30th day of April, 2024.

21 

22 _____
Jamal N. Whitehead
23 United States District Judge